

Exhibit 1

STATE OF MINNESOTA
COUNTY OF WINONA

DISTRICT COURT
THIRD JUDICIAL DISTRICT
PERSONAL INJURY
COURT FILE NO. _____

SANDRA K. RUDOLPH and DAVID RUDOLPH

Plaintiffs

v.

WALMART, INC.

Defendant

SUMMONS

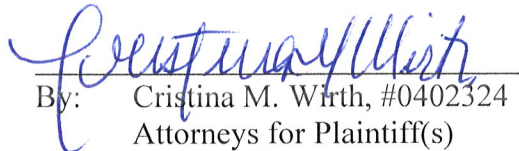
THE STATE OF MINNESOTA TO the above-named Defendant:

You are hereby summoned and required to serve upon Plaintiffs' attorney an answer to the Complaint that is herewith served on you within twenty-one (21) days after the service of this Summons on you, exclusive of the day of the service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

This case may be subject to alternative dispute resolution ("ADR") under Rule 114 of the General Rules of Practice for the District Courts. ADR rules do not suspend your obligation to serve an answer to the Complaint within twenty-one days.

Dated the 21st day of December, 2021.

BYE, GOFF & ROHDE, Ltd.

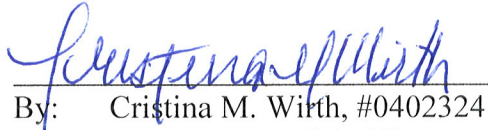

By: Cristina M. Wirth, #0402324
Attorneys for Plaintiff(s)

258 Riverside Drive, BOX 167
River Falls, Wisconsin 54022
Telephone: (715) 425-8161
E-mail: cristina@byegoff.com

ACKNOWLEDGMENT

The undersigned acknowledges that sanctions may be imposed under the circumstances specified in Minn. Stat. § 549.211.

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COMPLAINT

Plaintiffs complain of Defendant, and for cause thereof allege:

1. Plaintiffs Sandra K. Rudolph and David Rudolph reside at 3406 S. 33rd Street, La Crosse, Wisconsin 54601.

2. Defendant Walmart, Inc. is an entity whose registered agent is CT Corporation System Inc., 1010 Dale Street N, St. Paul, Minnesota 55117-5603.

3. Plaintiffs are now and were at all times relevant hereto husband and wife.

4. At all material times, as a property owner Defendant Walmart, Inc. owed a duty of due and reasonable care to prevent foreseeable harm to entrants on the property such as Plaintiff Sandra K. Rudolph. Defendant Walmart, Inc. undertook and owed a duty of due and reasonable care to inspect, clean and maintain the premises, to warn entrants of hazardous conditions, and to detect and remove hazardous conditions.

5. On January 5, 2021, Plaintiff Sandra K. Rudolph was injured as a result of a fall that occurred when she tripped over an empty flatbed cart in the customer service area at Walmart Supercenter, 955 Frontenac Drive, Winona, Winona County, Minnesota.

6. The empty flatbed cart on which Plaintiff Sandra K. Rudolph tripped and fell was either negligently placed in the customer service area by Defendant Walmart, Inc. and/or its agents and/or employees, or was present in the customer service area for a sufficient period of time that Defendant Walmart, Inc. and/or its agents and/or employees knew or should have known of the object's hazardous presence but failed to remove it. Plaintiff Sandra K. Rudolph's injuries were proximately caused by the negligence of Walmart, Inc., its agents and/or employees.

7. Defendant Walmart, Inc. and/or its agents and/or employees were negligent in failing to inspect, clean, or maintain the property and were negligent in failing to detect and remove a hazardous condition. Defendant and/or its agents and/or employees may have been causally negligent in other ways.

8. As a direct and proximate result of Defendant's negligence, Plaintiff Sandra K. Rudolph has suffered serious injury and pain and suffering, and has incurred economic loss, non-economic loss and damages, past and future.

9. As a direct and proximate result of Defendant's negligence, Plaintiff Sandra K. Rudolph has been caused to expend money for the medical care and treatment of her injuries, and in the future will be required to expend sums of money for medical treatment of her injuries.

10. Defendant Walmart, Inc. is directly or vicariously liable for the acts or omissions of its employees and agents in the course of employment.

11. As a direct and proximate result of Defendant's negligence, Plaintiff David Rudolph has been denied the services and companionship of Plaintiff Sandra K. Rudolph.

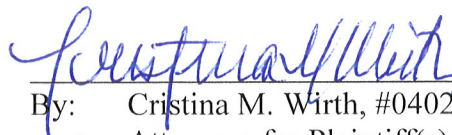
12. Defendant Walmart, Inc. is legally responsible and liable for all Plaintiffs' losses and damages caused by Plaintiff Sandra K. Rudolph's fall injury of January 5, 2021.

13. Plaintiffs are entitled to recover damages from Defendant for all the losses Plaintiffs sustained as a direct and proximate result of Defendant's negligence.

WHEREFORE, Plaintiffs pray for judgment against Defendant for damages in an amount exceeding Fifty Thousand Dollars (\$50,000), costs and disbursements, an order extinguishing claims of subrogation and reimbursement, and other relief the Court deems just.

Dated this 21st day of December, 2021.

BYE, GOFF & ROHDE, Ltd.

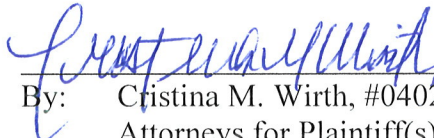

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